

## dward ATCB

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**From:** Yukari.Ito@jp.ul.com  
**Sent:** Wednesday, August 11, 2004 5:37 PM  
**To:** dward@atcb.com  
**Cc:** hiroka.umeyama@jp.ul.com; whgraff@americanTCB.com  
**Subject:** RE: PQRDS540-APDL

Dear Dennis,

With regard to your additional question for Item 5 (Operational Description), our answer is "Yes."

Is this answer enough for Item 5?

As for Item 4, 15.407(c) requirement, we are still waiting for manufacturer's reply. Since the manufacturer have summer holiday now (until August 17), we will obtain answer from them after August 17.

We will upload the documents as soon as we receive from them.

Please issue FCC Grant soon after we provide you with the information.

We appreciate your support.

Best regards,

Yukari

\*Our summer holiday starts on August 13 till August 17.

"dward ATCB" <dward@atcb.com>  
2004/08/11 08:53  
Please respond to  
<dward@atcb.com>

To  
<hiroka.umeyama@jp.ul.com>  
cc  
<yukari.ito@jp.ul.com>, <whgraff@americanTCB.com>  
Subject  
RE: PQRDS540-APDL

Hi Yukari

I talked with Tim Harrington of the FCC at the IEEE symposium today. The issue of the antenna being integral and what that means came up. Consequently, because previous applications have gone through, I believe that the answer provided in your correspondence will meet the FCC requirements. Thus the only thing I am waiting for now is the clarification on item 5 and the manufacturer response to item 4.

Once I receive these the grant can be issued

Thanks  
Dennis

From: dward ATCB [mailto:dward@atcb.com]

Sent: Tuesday, August 10, 2004 8:19 AM  
To: 'hiroka.umeyama@jp.ul.com'  
Cc: 'yukari.ito@jp.ul.com'; 'whgraff@americanTCB.com'  
Subject: RE: PQRDS540-APDL

Hi Yukari / Kiroka

I received your correspondence and answers to the ATCB comments. Please note that the answer to item 3 is not adequate. Please note that the device is used in the UNII bands. Please also note that the FCC has stated that professional installation is not sufficient to meet the integral antenna requirements of this band. In order for a device antenna to meet the integral (permanent) requirement stated in 15.407 it must not be accessible to the end user or it must be otherwise permanently attached so that attempt to remove the antenna would destroy the connection. If the device can be opened by the user using standard tools then the FCC would not consider this as 'inaccessible' to the end user. The FCC has accepted epoxied connectors as meeting the requirements and has accepted the use of special tools to open the device as acceptable. However, as mentioned, just because the transmitter is installed by the OEM does not mean the antenna connection meets the integral requirements of 15.407. Please explain how the antenna connector is either permanently installed, or please explain how the device is made inaccessible to the end user (special screws requiring special tools etc).

Please note also that in the near future, this issue will not be of concern, but for now the FCC is still requiring information on how the antenna is made integral.

As to your response to item 5

Are you saying that the numbers in the operational description are those that would be measured without adding the res bandwidth correction factor when the analyzer is set to 1MHz res bandwidth and 3MHz video bandwidth and with an analyzer that does not have channel power functionality????? Please clarify.

As soon as I have your answers to the above and your response to item 4 of the comments, I can proceed with the issuance of the grant.

Thanks  
Dennis

From: dward ATCB [mailto:dward@atcb.com]  
Sent: Sunday, August 08, 2004 10:19 PM  
To: 'hiroka.umeyama@jp.ul.com'  
Cc: 'yukari.ito@jp.ul.com'  
Subject: PQRDS540-APDL

Hi Hiroka / Yukari  
Please see comments  
Thanks  
Dennis

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